

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

Christopher Polansky *
*
Plaintiff *
*
v. * 16-cv-00256-LM
*
New Hampshire Dep't of Corr. et al., *
*
Defendants *

SUPPLEMENT TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Defendants, William Wrenn, Ryan Landry, and Judy Baker, by and through counsel, the Office of the Attorney General, submit this supplement to its motion for summary judgment, and state as follows:

1. On April 24, 2017, defendants filed a motion for summary judgment with attached exhibits.
2. On May 25, 2017, defendants were notified by way of this court's electronic filing system that exhibits D-1 and D-2 to the motion for summary judgment contained personal identifiers.
3. On this date, defendants filed a motion to seal exhibits D-1 and D-2 to the motion for summary judgment.
4. To supplement defendants' motion for summary judgment, attached are redacted versions of exhibits D-1 and D-2.

WHEREFORE, defendants respectfully request that this Honorable Court:

- A. Accept the redacted exhibits D-1 and D-2 as supplements to defendants' motion for summary judgment; and
- B. Grant such further relief as may be deemed just and proper.

Respectfully submitted,

WILLIAM WRENN
RYAN LANDRY
JUDY BAKER

By their attorney,

GORDON J. MACDONALD
ATTORNEY GENERAL

Date: June 1, 2017

/s/ Francis Fredericks
Francis C. Fredericks, No. 21161
Assistant Attorney General
New Hampshire Attorney General's Office
33 Capitol Street
Concord, New Hampshire 03301-6397
Telephone: (603) 271-3650
Email: francis.fredericksjr@doj.nh.gov

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was mailed, postage prepaid, this 1st day of June 2017, to:

Christopher Polansky
The Gracy Wood Nursing Home
12021 Metric Blvd
Austin, TX 78758

/s/ Francis C. Fredericks
Francis C. Fredericks, No. 21161